

Sandia National Laboratories

**PROPOSAL FOR ADMINISTRATIVE
NO FURTHER ACTION
ENVIRONMENTAL RESTORATION
SITE 73, HAZARDOUS WASTE
REPACKAGING/STORAGE (BUILDING 895)
OPERABLE UNIT 1302**

August 1994

Environmental
Restoration
Project



United States Department of Energy
Albuquerque Operations Office

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**SITE 73, Hazardous Waste Repackaging/Storage (Building 895)
OU 1302**

SANDIA NATIONAL LABORATORIES/NEW MEXICO

1.0 INTRODUCTION

Sandia National Laboratories/New Mexico (SNL/NM) is proposing an administrative No Further Action (NFA) decision for Environmental Restoration (ER) Site 73, Hazardous Waste Repackaging/Storage (Building 895), Operating Unit (OU) 1302.

The repackaging and short-term storage facility was a hazardous waste handling facility used to repackage and temporarily store hazardous waste collected from the various generator groups at SNL/NM. The facility was designed to prevent potential contamination from penetrating the outside environment. No releases were reported for this site. Because there is no potential for a release that poses a threat to human health or the environment, this site is being proposed for an NFA determination.

2.0 HISTORY OF UNIT

ER Site 73 is located in the southwest corner of the intersection of "L" Street and 11th Street near the center of Technical Area (TA)-I (Attachment 1; Figure 5.8-1). The site was formerly occupied by Building 895 which originally served as a paint storage facility. Building 895 was a concrete block structure measuring approximately 119 feet by 15 feet, prior to its demolition. The building was divided into four rooms (bays) of equal size, each having outdoor access (Kearney 1987).

In 1984, the three northernmost bays of Building 895 were converted into a hazardous waste repackaging and temporary storage facility. The southernmost room was used to store chemicals and equipment used to treat cooling tower water. The hazardous waste facility was modified to comply with interim status requirements for hazardous waste storage as defined in 40 CFR 265. All floor drains were sealed and the concrete floors were coated with an epoxy-based sealer. Berms of 3-inch-high asphalt and 4-inch-high concrete were constructed to provide containment and to segregate incompatible wastes. The berms prevented interior spills from reaching the outside environment, as well as preventing rain and surface water from running into the building (Kearney 1987). The floors sloped to a central containment location within each bermed area.

At this facility, containerized and solidified wastes were stored for less than 90 days in the segregated areas prior to transport and disposal off-site (SNL/NM 1986). Liquid wastes were solidified in 55-gallon drums by the addition of vermiculite (Kearney 1987). During its operation, a variety of hazardous materials generated at SNL/NM were delivered weekly, segregated into compatible types, and placed in containers in the bermed areas. The maximum amount of wastes stored at any one time was 5,500 gallons, with the southern bay storing caustics, organic acids, inorganic acids, cyanides, sulfides, neutral metals or salts. The middle bay stored katlin reactives and shock-sensitive and heat-reactive wastes. The northern bay stored hydrocarbons, organics, and flammable wastes. The building was routinely inspected for problems associated with safety, emergency equipment, security, containers, container storage facilities, and loading/unloading facilities (Kearney 1987).

Employees interviewed during the background investigation for the Resource Conservation and Recovery Act (RCRA) Facility Investigation Work Plan stated that the facility was operated in compliance with interim status hazardous waste storage requirements and that there were no spills or release of materials from the facility (SNL/NM 1993). No information reviewed during the background investigation indicated a release of hazardous waste during facility operations. However, based solely on the fact that this was a hazardous waste facility, the site was listed in the Comprehensive Environmental Assessment Response Program (CEARP) Phase 1 report as an ER Site (DOE 1987).

Between 1987 and 1988, Building 895 was demolished after a RCRA-permitted hazardous waste facility was constructed south of TA-I. The site is now open space, covered with wide concrete sidewalks and gravel landscape.

In the CEARP document (DOE 1987) this site is listed as a Potential RCRA Treatment and Disposal Facility, and is described in this document on page V-39:

"V.B.1.a. Hazardous Waste Repackaging and Storage Facility (Building 895)

- The repackaging and short-term (less than 90 days) storage facility (Site 73) is a hazardous waste handling facility used to repackage and temporarily store hazardous waste collected from the various generator groups at Sandia (Section II.H.1.a).
- Finding -- Positive for RCRA-regulated hazardous waste; however, a [sic] HRS migration mode score is not appropriate because all material is contained within the building.
- Planned Future Action -- Sandia has addressed this site under the RCRA Part B application. No further action is planned under CEARP."

3.0 EVALUATION OF RELEVANT EVIDENCE

The hazardous waste repackaging and storage facility at Building 895 was designed and operated to prevent a release of hazardous wastes, including hazardous constituents, to the environment. There have been no documented releases of hazardous materials or wastes from the building.

4.0 CONCLUSION

ER Site 73, the "Hazardous Waste Repackaging/Storage Building (Bldg. 895)", is proposed for NFA based on the following two reasons. First, the building was designed to prevent releases of hazardous materials to the environment. Second, there is no record of a release of hazardous or radioactive constituents to the environment. Based on this evidence, it has been concluded that this site was improperly designated as an ER Site. Therefore, an NFA determination is requested for this site.

5.0 REFERENCES

Kearney (A.T. Kearney, Inc.) 1987. "Final RCRA Facilities Assessment Report of Solid Waste Management Units at Sandia National Laboratories, Albuquerque, New Mexico." April 1987.

40 CFR 265. Code of Federal Regulations, 1991. Interim Status Standards for Owners and Operators of Hazardous Waste Treatment, Storage, and Disposal Facilities.

SNL/NM 1986. Sandia National Laboratories, Albuquerque. Fiscal Year 1986 Waste Management Site Plan.

SNL/NM 1993--TA-I interview report.

U.S. Department of Energy (DOE 1987). "Draft Comprehensive Environmental Assessment and Response Program (CEARP), Phase 1: Installation Assessment." September 1987.

6.0 LIST OF ATTACHMENTS

Attachment 1

Figure 5.8-1 - Location of ER Site 73, Hazardous Waste Repackaging/Storage

Attachment 1

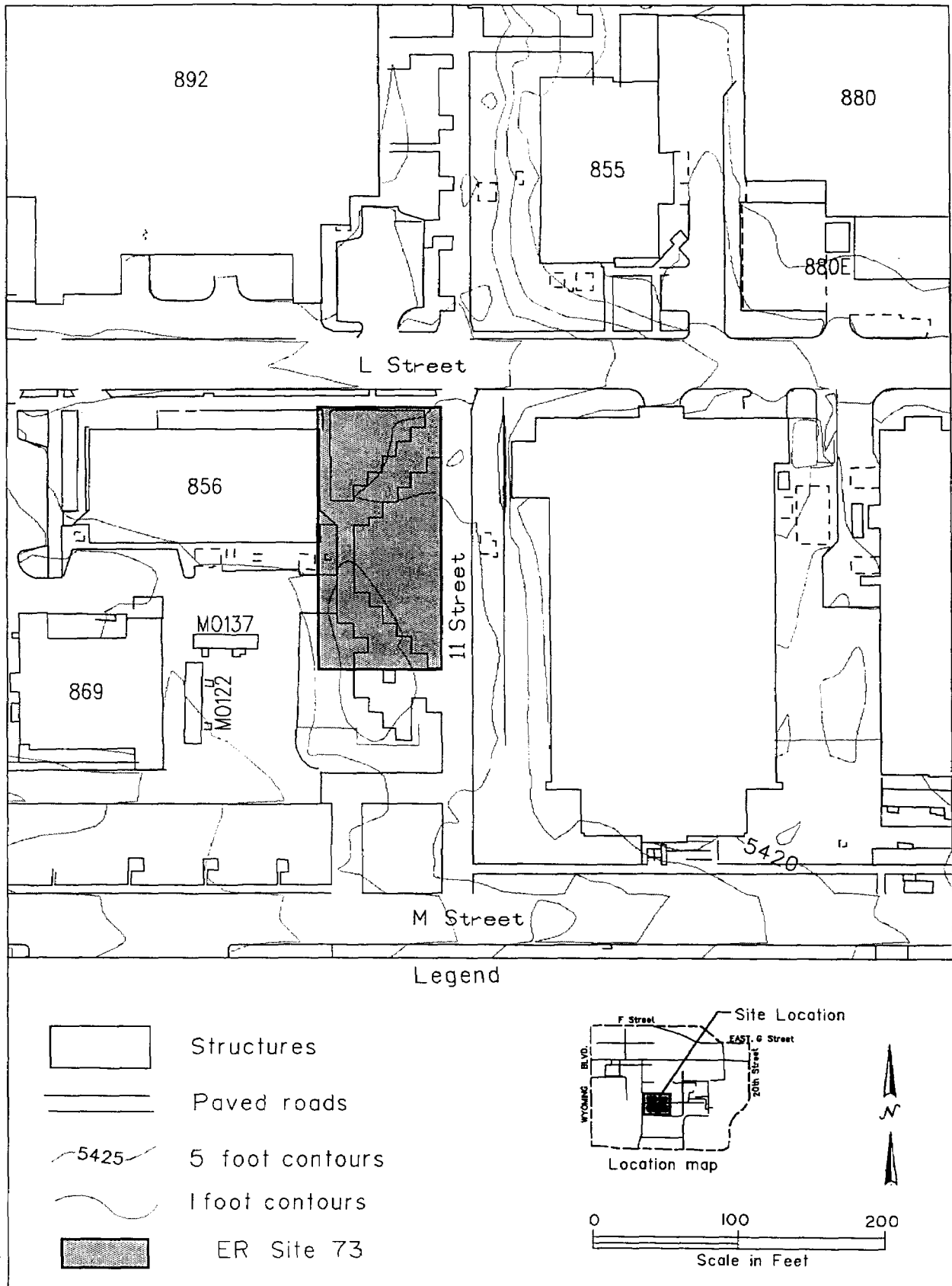


Figure 5.8-1
Location of ER Site 73: Hazardous Waste
Repackaging/Storage (Building 895).